

August 17, 2018

Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attn: Ms. K. Walli  
Board Secretary

Dear Ms. Walli

Re: **EB-2015-0304**  
**Review of Miscellaneous Rates and Charges – Energy Retailer Service Charges**

The EDA thanks the Ontario Energy Board (OEB, the Board) for its Draft Report on Energy Retailer Service Charges. The EDA's LDC members will be directly impacted by the OEB's findings and determinations in this matter and we appreciate the opportunity to provide our comments on the Board's Draft Report.

We are encouraged by many of the Board's proposals. The proposed directional change is considered a sound first step in the renewal of the OEB authorized Retailer Service Charges (RSCs) and is expected to continue so that, ultimately, the OEB authorized RSCs are just and reasonable, do not result in undue cross subsidization and fulfill the OEB's guiding principles. The EDA is supportive of:

- the proposed initial doubling of currently authorized RSCs
- the proposed annual adjustment
- the establishment of the Switch Letter RSC and
- the inclusion of Commodity related Bad Debt costs in the costs recovered by the RSCs.

LDCs should be permitted discretion as to whether they levy the Switch Letter RSC and whether they retire their Retail Service Cost Variance Accounts. Also, we are not convinced that it is necessary to establish a new deferral account. These positions are set out in greater detail in Attachment A.

The EDA welcomes any questions or comments you may have. Please contact the EDA through Kathi Farmer, Senior Regulatory Affairs Advisor at [kfarmer@eda-on.ca](mailto:kfarmer@eda-on.ca) or 905.265.5333.

We thank the OEB for administering this phase of the review of Specific Service Charges and look forward to both the OEB's final determinations on OEB authorized RSCs and to the next steps in the overall project.

Sincerely



Teresa Sarkesian  
President & Chief Executive Officer

Attachment

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